

## REMARKS

Claims 7-27 are pending. By this amendment, the specification, drawings and claims are amended, as well as new Claims 26-27 added to provide more comprehensive protection for certain aspects of the invention.

Applicants have amended the specification, drawings and objected to claims in accordance with the Examiner's recommendations to overcome the noted informalities. Applicants submit the amendments to the claims are to correct artifacts of the nationalization of this application and do not narrow the claims in any matter. Accordingly, withdrawal of the objection to the drawings, specification and rejection under 35 U.S.C. § 112 is respectfully requested.

The Office Action rejects Claims 7 and 25 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,434,694 to Slaughter in view of U.S. Patent No. 5,678,047 to Golshani (hereinafter "Golshani"). This rejection is respectfully traversed.

Applicants would like to thank Examiners Tang and Dam for the courtesies extended to Applicants' representative, Mr. Jason Vick, during the February 4 Personal Interview. During the interview, the general operation of the invention was discussed as well as Claim 7 contrasted with the Slaughter and Golshani references. The Examiners agreed they understood the operation of the invention and requested we file a formal response that clarified the claim language including specifying whether "table C" was intended to be included in the independent claims.

Claim 7 recites, *inter alia*, a method for controlling a function executable by various software products by means of commands specific to the respective software products and each command capable of having at least one option, ... comprising defining in an abstract class an abstract method for the function, the abstract method including parameters

corresponding to a union, in the logical sense, of all the options of a specific command, defining a common command that includes arbitrary symbols corresponding to parameters of the abstract method, creating at least one driver...and executing by the driver one of the specific commands.... Similarly, Claim 20 is directed toward a computer system adapted to implement the methodology of Claim 7.

As discussed during the Personal Interview, Slaughter is directed toward a security system for platform-independent device drivers. In particular, the system of Slaughter allocates securely memory resources to platform-independent drivers. As discussed on column 6, lines 15-47 of Slaughter, a hierarchy of abstract and instantiable memory classes is illustrated where the hierarchy is headed by a Memory abstract class that includes on the general attributes of a base address, length and constraints, each of which attributes are also objects. Slaughter goes on to further state that the Main Memory 404 is an abstract class that includes with those attributes inherited from Memory 402 abstract methods for managing caching that are ultimately implemented in the instantiable classes Physical Memory 412, Port I-O Memory 414, and Virtual Memory 416.

Slaughter does not disclose that the abstract method includes parameters corresponding to a union of all options of a specific command as recited in Claims 7 and 20. As can be seen in Fig. 4 of Slaughter, the Virtual Memory 416 and Port I-O Memory 414 inherit from Main Memory through the abstract classic Accessible Memory 410 that also inherits from Main Memory. Thus, as discussed in Slaughter, by using the abstract class Main Memory, those Platform-Specific Memory management functions can be accessed in a platform independent manor.

At no point does Slaughter teach or suggest that the abstract method includes parameters corresponding to a union of all options of a specific command. While Slaughter

discloses in various locations that classes include objects, at no point does Slaughter state that the abstract method includes parameters corresponding to union of *all* options of a specific command.

Golshani fails to overcome the deficiencies as noted above in relation to Slaughter. Particularly, while the Office Action points to column 2, lines 20-40 of Golshani for the teaching of this feature, Applicants have carefully reviewed this passage and submit that it relates to a translator that can provide information about the translation and describes commands. In particular, upon selecting whether the UTG is to run in a “verbose” mode or a “terse” mode, the UTG is capable of providing information about the translation. However, being able to select an option for a translator governing its method of operation is not relevant to the claimed invention nor, is it combinable with the teachings of Slaughter since they are from different fields of endeavor, are used to address different problems, and there is no motivation in the references themselves to combine the teachings.

Comparable arguments can be made for the claims that depend from Claims 7 and 20 and Applicants respectfully submit that the operating system translator of Golshani has no relevance nor bearing on the features recited in the dependent claims. Accordingly, the dependent claims that depend from Claims 7 and 20 are also not anticipated, nor rendered obvious, by the cited references either alone or in combination.

Accordingly, the rejection under 35 U.S.C. § 103 is untenable and should be withdrawn.

Applicants have also added new Claims 26 and 27, with Claim 26 stating, *inter alia*, the abstract method including parameters corresponding to a union of all the options of a specific command, where the options are an argument that is capable of modifying the function of the specific command. There is no teaching or disclosure of this feature in any of

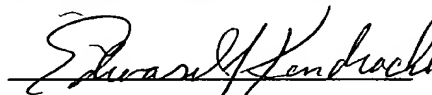
the references of record. A comparable argument can be made for Claim 27. An early Notice of Allowance is respectfully requested.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the telephone number listed below.

The Commissioner is hereby authorized to charge to deposit account number 50-1165 (Docket No. T2147-906520) and fees not included herein, under 37 CFR §§ 1.16 and 1.17, that may be required by this paper and to credit any overpayment to that Account. A duplicate copy of this page is included for such purpose. If any additional extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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## ABSTRACT

The method is used to control a function ( $\Phi$ ) executable by various software products (~~4a, 4b, 6a, 6b~~) by means of commands (~~Pa-Pd~~) specific to the respective software products and each capable of having at least one option, the software products being installed in at least one machine (~~2a, 2b~~) of a computer system (10). ~~Said~~ The method consists of includes defining in an abstract class an abstract method for the function ( $\Phi$ ), of defining a common command (~~P0~~) that includes arbitrary symbols corresponding to the parameters of the abstract method, of creating at least one driver (~~S2~~) for implementing the abstract method in a machine, and having the driver execute one of the specific commands with options equivalent to the options of the common command.

~~Fig. 1 to be published.~~